From: John Hebert
To: Bill Jacobs

Subject: Re: Fw: Rodenticide Question (UNCLASSIFIED)

Date: 05/13/2010 03:33 PM

thanks Bill....good, thorough answer.

john

▼ Bill Jacobs---05/13/2010 03:08:32 PM---The label for the product being used indicates how it may or may not be used. Labels for most roden

From: Bill Jacobs/DC/USEPA/US
To: william.miller1@us.army.mil

Cc: John Hebert/DC/USEPA/US@EPA, Linda Arrington/DC/USEPA/US@EPA, Steve

Hopkins/DC/USEPA/US@EPA

Date: 05/13/2010 03:08 PM

Subject: Fw: Rodenticide Question (UNCLASSIFIED)

The label for the product being used indicates how it may or may not be used. Labels for most rodenticide baits currently registered for controlling commensal rats and mice in structural situations require that baits be put in tamper-resistant bait stations in their placements otherwise would be within reach of children, pets, domestic animals, and nontarget wildlife.

The properties of the bait station selected rather than a set distance are what would limit the incidence of exposure of children to the rodenticide bait. Distances of 50 or 100 feet can be covered quickly by children. That having been said, all applicators are expected to assess use sites for potential risk scenarios and proceed accordingly.

With respect to applications associated with agricultural buildings as stipulated in the Risk Mitigation Decision (RMD) for rodenticides, the 50-foot stipulation pertains to the maximum distance from agricultural buildings that baits labeled for use in or near agricultural buildings may be used. A similar limitation ("Do not apply further than 50 feet from buildings") applies to baits products labeled for use in and near other types of buildings. Such statements are being added to labels of commensal rodenticide bait products as they are being amended (or newly registered) for use in these types of structural situations. Labels for such products must bear these restrictions when the RMD goes into full effect next year.

---- Forwarded by Bill Jacobs/DC/USEPA/US on 05/13/2010 02:39 PM -----

From: Linda Arrington/DC/USEPA/US
To: Steve Hopkins/DC/USEPA/US@EPA

Cc: Bill Jacobs/DC/USEPA/US@EPA, John Hebert/DC/USEPA/US@EPA

Date: 05/13/2010 10:49 AM

Subject: Re: Fw: Rodenticide Question (UNCLASSIFIED)

Hi Steve,

I have copied Bill Jacobs and John Hebert who handle the rodenticides to respond to him directly.

Linda Arrington Registration Division 703 305 6249 703 305 6920 (fax)

▼ Steve Hopkins---05/13/2010 08:47:59 AM---Linda - can you help me direct this to the right place to get an answer for Col (ret). Miller? Thank

From: Steve Hopkins/DC/USEPA/US

To: Linda Arrington/DC/USEPA/US@EPA

Date: 05/13/2010 08:47 AM

Subject: Fw: Rodenticide Question (UNCLASSIFIED)

Linda - can you help me direct this to the right place to get an answer for Col (ret). Miller?

Thanks.

Steve.

---- Forwarded by Steve Hopkins/DC/USEPA/US on 05/12/2010 03:25 PM -----

From: "Miller, William CIV USA IMCOM AEC" <william.miller1@us.army.mil>

To: Steve Hopkins/DC/USEPA/US@EPA

05/12/2010 02:56 PM

Subject: Rodenticide Question (UNCLASSIFIED)

Classification: UNCLASSIFIED Caveats: NONE

Steve,

Howdy! Have a question regarding rodenticide labeling . Could

forward to whomever is working rodenticides.

I was asked in class the other day: Is it 50' or 100' that rodent baits should be away from Child Development Centers?

As I read the Risk Mitigation Decision, baits should be in child-resistant packaging and placed no more than 50' of a agricultural center.

I'm thinking the student's question, although well-meaning, is wrong.

Thanks, Bill

William B. Miller, Ph.D. Pest Management Consultant Army Environmental Command Fort Sam Houston, Texas (210) 295-2299 william.miller1@us.army.mil

Classification: UNCLASSIFIED

Caveats: NONE